

Appln No. 09/693,565

Amdt date December 13, 2004

Reply to Office action of August 11, 2004

#### REMARKS/ARGUMENTS

Claims 1-10, 17-20 and 25-26 are in the present application, of which claims 1 and 17 are independent. Claims 1 and 17 have been amended herein. Claims 11-16 and 21-24 have previously been canceled. New claims 25 and 26 have been added herein. Applicants respectfully request reconsideration and allowance of claims 1-10 and 17-20. Applicants further request consideration on the merits and allowance of claims 25 and 26.

#### I. Telephone Interview

First of all, applicants appreciate and would like to thank the Examiner for the time and courtesy extended to applicants' attorney during the telephone interview of November 12, 2004. During the telephone interview, claims 1 and 17<sup>1</sup> have been discussed in reference to U.S. Patent No. 6,067,530 ("Brooks et al."). No agreement was reached, however, as to the patentability of any of the claims.

During the telephone interview, the Examiner has contended that the date information printed on the report in Brooks et al. can be viewed as identifiers or sequence number/alternate sequence number without providing a detailed explanation. Applicants' attorney agreed to further consider the Examiner's contentions in the course of preparing a response to the outstanding Office Action.

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<sup>1</sup> While the Interview Summary mailed by the Examiner on November 17, 2004 indicates that claims 1 and 13 have been discussed, claim 13 has previously been canceled. Applicants believe that the Examiner meant claim 17, which was discussed.

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## **II. Rejection of Claims 17-19<sup>2</sup> under 35 U.S.C. §101**

Claims 17-19 continue to be rejected because they allegedly lack patentable utility under 35 U.S.C. §101. The Office Action states that claims 17-19 only claim the manipulation of data but perform no concrete, useful or tangible result. The Office Action further states that this rejection could be overcome by including a positive recitation of a report being generated.

Applicants have amended claim 17 as suggested by the Examiner. Claim 17 now recites, in a relevant portion, "a central control unit which receives the deposit information from the safe assembly, generates a deposit report concerning the deposit information, updates, using the control software, the sequence number and the alternate sequence number, and transmits the deposit report, the sequence number and the alternate sequence number, wherein the central control unit updates the alternate sequence number upon an occurrence of an armored car pickup." (Emphasis Added). Therefore, applicants request that the rejection of claims 17-19 under 35 U.S.C. §101 be withdrawn. Also, any §101 rejection of claim 20 based on the same ground should be withdrawn as well.

## **III. Rejection of Claims 1-10 and 17-20 under 35 U.S.C. §102(e) and/or 35 U.S.C. §103(a)**

Claims 1, 2, 4-10 and 17-20 have been rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Brooks et al.. Further, claims 1-10 and 17-20 have been rejected under 35

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<sup>2</sup> While the Office Action states claims 17-20, applicants believe that the rejection of claim 20 has been withdrawn because the Office Action states claims 17-19 in a sentence which is immediately prior to the sentence stating claims 17-20.

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U.S.C. § 103(a) as allegedly being unpatentable over Brooks et al. in view of Examiner's Official Notice.

In rejecting claims 1, 2, 4-10 and 17-20, the Examiner states "[f]unctional recitation(s) used in apparatus claims (e.g., "wherein whether the deposit information was accumulated during the accounting period before the predetermined event or during the accounting period after the predetermined event is indicated by whether the identifiers are different from one another or identical to each other" as recited in claim 1) are given little patentable weight because they fail to add any structural limitations and are thereby regarded as intended use language."

To overcome this rejection, a structure for performing such functions has been added respectively to claims 1 and 17.

Claim 1 now recites, "a memory in which a control software is stored, the control software for updating a pair of identifiers that distinguish deposit information accumulated only during an accounting period before a predetermined event and deposit information accumulated during an accounting period that includes a period after the predetermined event, wherein values for the pair of identifiers includes values unrelated to a date and/or a time of the predetermined event; a central control unit which receives deposit information from the safe assembly and generates and transmits deposit reports, the central control unit, using the control software, updates and transmits the pair of identifiers, wherein the central control unit, using the control software, indicates whether the deposit information was accumulated only during the accounting period

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before the predetermined event or during the accounting period that includes a period after the predetermined event by making the identifiers to be different from one another or to be identical to each other." (Emphasis Added).

Claim 17 now recites, in a relevant portion, "a memory in which a control software is stored, the control software being used for updating a sequence number and an alternate sequence number such that the sequence number and the alternate sequence number are successively the same as or different from each other, wherein the sequence number and the alternate sequence number are unrelated to any date and/or time information; a central control unit which receives the deposit information from the safe assembly, generates a deposit report concerning the deposit information, updates, using the control software, the sequence number and the alternate sequence number . . ." (Emphasis Added).

Hence, in claims 1 and 17, a structural limitation of "a memory in which a control software is stored" has been added. The control software is used by the central control unit in claims 1 and 17 to indicate ". . . by making the identifiers to be different from one another or to be identical to each other" and to update "a sequence number and an alternate sequence number such that the sequence number and the alternate sequence number are different from one another or are identical to each other," respectively. By way of example, such a memory is illustrated as memory 13 in FIGs. 1 and 3 of the application as filed.

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Claims 1 and 17 as amended also include respective limitations that clarify a patentably distinguishable feature of the claimed invention. This was done to alleviate the Examiner's concern that the dates in the report in Brooks et al. can be viewed as a pair of identifiers or as a sequence number and an alternate sequence number. As recited above, claim 1 now recites, "values for the pair of identifiers include values unrelated to a date and/or a time of the predetermined event," and claim 17 now recites "the sequence number and the alternate sequence number are unrelated to any date and/or time information."

#### **IV. Response to Arguments**

In response to applicants' arguments, the "Examiner contends that Brooks, Jr. et al. does disclose the claimed central control unit," and states "[a]s the Applicant has not pointed out precisely what limitation Brooks, Jr. et al. lacks other than reciting huge sections of the claims, which represent blanket arguments, it is hard for the Examiner to know what the Applicant feels is specifically lacking."

Applicants have amended the claims, in part, to explicitly state that which was already implicit in the claims. By way of example, claim 1 now recites "the central control unit, using the control software, indicates whether the deposit information was accumulated only during the accounting period before the predetermined event or during the accounting period that includes a period after the predetermined event by making the

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identifiers to be different from one another or to be identical to each other."

Hence, by making the identifiers, whose values are unrelated to the date and/or the time of the predetermined event, to be different from one another or to be identical to each other, the central control unit, using the control software, indicates whether the deposit information was accumulated only during the accounting period before the predetermined event or during the accounting period that includes a period after the predetermined event. Applicants submit that such use of the identifiers (i.e., making the identifiers different or identical to indicate whether the deposit information was accumulated only during the accounting period before the predetermined event or during the accounting period that includes a period after the predetermined event, wherein values for the pair of identifiers are unrelated to a date and/or a time of the predetermined event) is neither taught nor suggested by Brooks et al. and/or any other art of record.

Further, claim 17 recites, in a relevant portion, "a memory in which a control software is stored, the control software being used for updating a sequence number and an alternate sequence number such that the sequence number and the alternate sequence number are successively the same as or different from each other, wherein the sequence number and the alternate sequence number are unrelated to any date and/or time information . . . wherein the central control unit updates the alternate sequence number upon an occurrence of an armored car pickup." Applicants submit that such updating of a sequence

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number and an alternate sequence number to be successively the same as or different from each other, wherein the central control unit updates the alternate sequence number upon an occurrence of an armored car pickup is neither taught nor suggested by Brooks et al. or any other art of record.

The Examiner further "contends that Brooks, Jr. et al. discloses 'a pair of identifiers' which for example could include any information that identifies deposit information, such as shown in column 16." Brooks et al. in column 16 discloses a number of variables/fields such as DATE, TIME, STORE NUMBER, HIDE/SHOW CANISTER TOTAL, and the like. The Examiner also "contends that Brooks, Jr. et al. discloses identifiers that indicate if the accounting information is from before or after a predetermined event which for example may include canister information relating to begin date and an end date as shown in column 19 lines 55+ which are updated and can meet the claim requirements."

As discussed above, claims 1 and 17 as amended clarified the "pair of identifiers" and "sequence number and alternate sequence number" to specifically exclude the construction proposed by the Examiner. As such, applicants believe that the claim amendments are sufficient to overcome the rejections over the art of record.

#### **V. New Claims 25 and 26**

New claims 25 and 26 have been added. Since claims 25 and 26 each depend from claim 1, they each incorporate all the terms and limitations of claim 1 in addition to other limitations,

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which together further patentably distinguish claims 25 and 26 over the art of record. Therefore, applicants request that the claims 25 and 26 be allowed.

#### **VI. Concluding Remarks**

Since a structure is provided for performing respective updating functions in claims 1 and 17 and the claimed updating functions are not taught or suggested by Brooks et al. or any other art of record, a patentably distinguishable structural difference has been shown between the claimed invention of claims 1, 17 and the prior art. Therefore, applicants request that the rejection of claims 1 and 17 be withdrawn and that they be allowed.

Since claims 2-10 and 18-20 depend, directly or indirectly, from claims 1 and 17, respectively, they include all the terms and limitations of claims 1 or 17 in addition to other limitations, which together further patentably distinguish them over the cited references. Therefore, applicants request that the rejection of claims 2-10 and 18-20 be withdrawn and that they be allowed.



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In view of the foregoing amendments and remarks, applicants respectfully request an early issuance of a patent with claims 1-10, 17-20 and 25-26. If there are any remaining issues that can be addressed over the telephone, the Examiner is invited to call applicants' attorney at the number listed below.

Respectfully submitted,

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By



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